

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	No. 4:21-CR-289-O
	§	
HOLLIS MORRISON GREENLAW (01)	§	
BENJAMIN LEE WISSINK (02)	§	
CARA DELIN OBERT (03)	§	
JEFFREY BRANDON JESTER (04)	§	
	§	

**GOVERNMENT’S MOTION FOR LEAVE TO FILE OMNIBUS RESPONSE IN OPPOSITION  
TO THE DEFENDANTS’ MOTIONS FOR RELEASE PENDING APPEAL AND  
FOR LEAVE TO EXCEED THE RESPONSE PAGE LIMIT**

The United States of America, by and through the undersigned Assistant United States Attorney, moves this Court for leave to file an Omnibus Response in Opposition to the Defendants’ Motions for Release Pending Appeal and for Leave to Exceed the Response Page Limit.

On Friday, May 20, 2022, each defendant filed a Motion for Continued Release Pending Appeal (“Motion for Release”). (Dkts. 461, 464, 466). That is, defendants Wissink and Obert filed a joint Motion for Release, and defendants Greenlaw and Jester separately filed their own Motions for Release. (Dkts. 461, 464, 466). Multiple of the arguments raised by the defendants overlap. Further, the defendants adopt each other’s arguments. The government’s response is due to be filed on June 3, 2022. (Dkt. 476).

Under the Court’s Local Rules, a response should not exceed 25 pages without leave of court. *See* N.D. Tex. Crim. L.R. 47.2(c). While the Rules envision that “extraordinary and compelling reasons” may require briefs in support of motions to exceed those page limitations, parties must obtain permission to file over length briefs. *See id.*

To effectively respond, and so as not to require the Court to needlessly read the same argument in multiple responses, the government requests leave to file an omnibus response to the defendants' motions. Further, the government seeks leave to file a response in excess of the Local Rules' 25-page limit. If authorized, the government anticipates its omnibus response will be no more than approximately 28 pages .

Respectfully Submitted,

CHAD E. MEACHAM  
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s/ Tiffany H. Eggers  
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CERTIFICATE OF CONFERENCE

I certify that on June 1, 2022, the undersigned attempted to confer with the below identified counsel for each defendant. Counsel for defendants Obert and Wissink indicated that they did not oppose the government's Motion for Leave to File an Omnibus Response in Excess of the 25-page limit. As of the filing of this motion, counsel for defendants' Greenlaw and Jester have not provided the government with their position.

Paul Pelletier, attorney for Hollis Greenlaw;

Guy Lewis, attorney for Benjamin Wissink;

Neal Stephens, attorney for Cara Obert; and

Jeff Ansley, attorney for Brandon Jester.

s/ Tiffany H. Eggers  
TIFFANY H. EGGERS  
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2022, I electronically filed foregoing with the Clerk of Court for the United States District Court, Northern District of Texas, using the electronic case filing system of the Court. Counsel for the defendants will be sent a copy of this document automatically through the electronic filing system.

/s/ Tiffany H. Eggers  
TIFFANY H. EGGERS  
Assistant United States Attorney